

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AUDREY SOVA,

Plaintiff,

v.

**RELIASTAR LIFE INSURANCE
COMPANY,**

Defendant.

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Case No. 1:23-cv-06146

Judge Sara L. Ellis

Magistrate Judge Jeffrey Cummings

**RELIASTAR LIFE INSURANCE COMPANY’S
MOTION FOR JUDGMENT ON THE ADMINISTRATIVE RECORD**

Defendant ReliaStar Life Insurance Company (“ReliaStar”), by and through its attorneys, Elizabeth G. Doolin and Kaitlyn E. Luther of Chittenden, Murday & Novotny LLC, pursuant to Fed. R. Civ. P. 52(a), states as follows for its Motion for Judgment on the Administrative Record:

1. Plaintiff Audrey Sova was a participant in an ERISA-governed employee welfare benefits plan for employees of The University of Chicago (the “Plan”) and admits the long term disability (“LTD”) benefits of the Plan are insured by a group insurance policy, Policy No. 72389-4LTD2011, issued by ReliaStar (the “Policy”). Plaintiff seeks payment of long term disability benefits under the Plan pursuant to 29 U.S.C. § 1132(a)(1)(B).

2. ReliaStar correctly determined that Plaintiff failed to show that she was disabled as that term is defined by the Plan or that she is entitled to benefits under the Plan.

3. Plaintiff fails to satisfy her burden of proof to show that she is entitled to any of the relief sought in the Complaint.

4. Judgment should be entered in favor of ReliaStar and against Plaintiff.

5. ReliaStar incorporates, as though fully set forth herein, the arguments in its Memorandum in Support of Its Motion for Judgment on the Administrative Record, filed contemporaneously herewith, and the findings of its Proposed Findings of Fact and Conclusions of Law cited therein.

WHEREFORE, Defendant ReliaStar Life Insurance Company respectfully requests that this Court grants its Motion for Judgment on the Administrative Record, deny Plaintiff's motion for judgment, enter judgment in favor of ReliaStar Life Insurance Company and against Plaintiff, dismiss Plaintiff's Complaint with prejudice, and award such other and further relief as this Court deems just and appropriate.

Dated: April 29, 2024.

Respectfully submitted,

RELIASTAR LIFE INSURANCE COMPANY

By: /s/ Kaitlyn E. Luther
One of its Attorneys

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